

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION**

PANTAURUS LLC,

Plaintiff,

v.

**GIESECKE & DEVRIENT AMERICA,
INC.,**

Defendant.

Case No. 1:15-cv-252

PATENT CASE

JURY TRIAL DEMANDED

AGREED MOTION TO DISMISS WITH PREJUDICE

Pursuant to Rule 41(a) of the Federal Rules of Civil Procedure and the terms of a separate agreement, Plaintiff PanTaurus LLC (“PanTaurus”) and Defendant Giesecke & Devrient America, Inc. (“Giesecke & Devrient”) file this agreed motion to dismiss with prejudice. The parties have agreed to settle all claims in the above-captioned action. The parties, therefore, move this Court to dismiss this action and all claims by PanTaurus against Giesecke & Devrient made therein, with prejudice, with each party to bear its own costs, attorney’s fees and expenses.

Wherefore, PanTaurus respectfully requests that the Court enter the proposed order of dismissal submitted with this motion.

Dated: October 13, 2015

Respectfully submitted,

/s/ Craig Tadlock

Craig Tadlock

State Bar No. 00791766

John J. Harvey, Jr.

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Keith Smiley

State Bar No. 24067869

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Attorneys for Plaintiff PanTaurus LLC

CERTIFICATE OF CONFERENCE

I hereby certify that on October 13, 2015, I conferred by email with counsel for Defendant. Defendant's counsel has agreed to the form and substance of this motion. Accordingly, this motion is an agreed motion.

/s/ Keith Smiley
Keith Smiley

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on October 13, 2015.

/s/ Craig Tadlock
Craig Tadlock